

IN THE COURT OF COMMON PLEAS  
MAHONING COUNTY, OHIO

STATE OF OHIO

PLAINTIFF

VS.

KALILO ROBINSON

DEFENDANT

CASE NO.: 16 CR 342

AFFIDAVIT OF  
THOMAS E. ZENA

Now comes Thomas E. Zena, Affiant herein, being first duly sworn according to law, deposes and states as follows:

1. I am the co-counsel of record for Marquan White in Mahoning County Common Pleas Court, *Case no.: 2015 CR 538, State v. White*. White is charged with aggravated murder, and murder.
2. Kalilo Robinson is listed as a State's witness in discovery provided in that case.
3. On or about January 19, 2016, it was disclosed that Kalilo Robinson was apparently not cooperating with the State in their case against Marquan White.
4. Judge D'Apolito had counsel brought in to speak with Kalilo Robinson
5. During proceedings on the above matter, the Prosecutor for the State of

EXHIBIT

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Ohio, Dawn Cantalamessa, advised that if Robinson did not cooperate the State would proceed to request an indictment against him in the murder case.

6. Counsel for Kalilo Robinson advised that due to the threat made by the Prosecutor, his client would be invoking his Fifth Amendment Right.
7. On April 5, 2016, a pre-trial hearing was held in State v. White, at which Kalilo Robinson invoked his Fifth Amendment Right.
8. The State of Ohio offered immunity to Kalilo Robinson.
9. Immunity was not granted to Kalilo Robinson, nor was Kalilo Robinson ordered to testify or answer further questions.

Further, Affiant sayeth naught.

  
THOMAS E. ZENA

Sworn to and subscribed in my presence this 7 day of August, 2016.

  
NOTARY PUBLIC



JAMES R. WISE  
Attorney At Law  
NOTARY PUBLIC  
STATE OF OHIO  
My Commission Has  
No Expiration Date  
Section 147.03 O.R.C.